

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,, }
v. } Plaintiff,
FRANKLIN ROBERT HILL, } CRIMINAL ACTION
Defendant. } NO. 05-10111-RBC
})

**GLOBE NEWSPAPER COMPANY, INC.'S OPPOSITION TO
DEFENDANT'S MOTION TO IMPOUND HIS SENTENCING
MEMORANDUM**

Globe Newspaper Company, Inc. (the "Globe") respectfully moves to intervene in this proceeding for the limited purpose of opposing defendant Franklin Robert Hill's motion to impound his sentencing memorandum. As grounds for its motion, the Globe relies on its memorandum of law filed herewith. See also In re Boston Herald, Inc., 321 F.3d 174, 177 (1st Cir. 2003) (noting intervention of media in criminal case for purpose of pursuing access request); In re Globe Newspaper Co., 729 F.2d 47, 50 n.2 (1st Cir. 1984) ("Some courts have held that media representatives may challenge closure orders by appeal if they first intervene in the underlying action.").

WHEREFORE, Globe Newspaper Company, Inc. respectfully requests that its motion to intervene be allowed and that the Court deny the defendant's motion to impound his sentencing memorandum.

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Dated: September 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by mail, hand or *email on 9/20/05*
David E. McCraw